



12/28/2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: Docket No. 17-258 – Promoting Investment in 3550-3700 MHz Band

Dear Ms. Dortch:

Solvaris is a Fixed Wireless Internet Service Provider operating in Michigan, just outside of metro Detroit - where the urban sprawl ends and rural living begins. Thanks to the NN license that we acquired in 2013, we are able to provide voice and data services, with speeds up to 25Mbps to both business and residential customers.

Due to excessive noise and interference in the 2.4GHZ band, we currently have only one viable option to overcome tree foliage in the “last-mile” delivery to our customers – fixed LTE using 3650 - 3700MHz. We are doing everything we possibly can to invest in the latest technology that leverages GPS synchronization and carrier aggregation, and thus enables us to reuse scarce, clean and available frequencies, and bond non-overlapping channels. We’ve purchased equipment from vendors such as Cambium Networks, Telrad, and Baicells Technologies. If the CBRS band truly materializes as the “innovation band”, then we will continue to invest in this technology and service more difficult to reach customers due to challenges imposed by both terrain and low population density.

We are optimistic and poised to expand our coverage in 2018, making good on a promise that we’ve made to our growing list of prospective customers. Among those who patiently sit on our waiting list are farmers, business owners, telecommuters, students, and even elderly shut-ins who are all anticipating our Internet service because of its quality, reliability and affordability. We are able to offer our service at a competitive price, without data usage caps, and without requiring lengthy contract terms.

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Rural America needs your help. It's an easy choice – one that won't further raise the barrier to entry for small businesses like ours, enabling us to make an impactful difference. We urge you to rule favorably for rural America by not conducting PAL auctions based on Partial Economic Areas that are merely friendly to the largest mobile carriers. By making PAL auction areas too large, small businesses will not have a level playing field by any means. We will effectively be unable to afford licenses for areas that are too geographically large. We are in favor of the PAL auctions being divided up according to census tracts as originally adopted by the FCC in April 2015 to establish the CBRS band. We're in this for the long haul and are in favor of 3 – 5 year license terms. When voting in favor of the census tract PAL sizes, small business and innovation will immediately benefit consumers in rural America.

Thank you for your consideration in this very important matter, and for taking the time to consider our views in the upcoming decision.

Sincerely,



Matthew Lauer

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